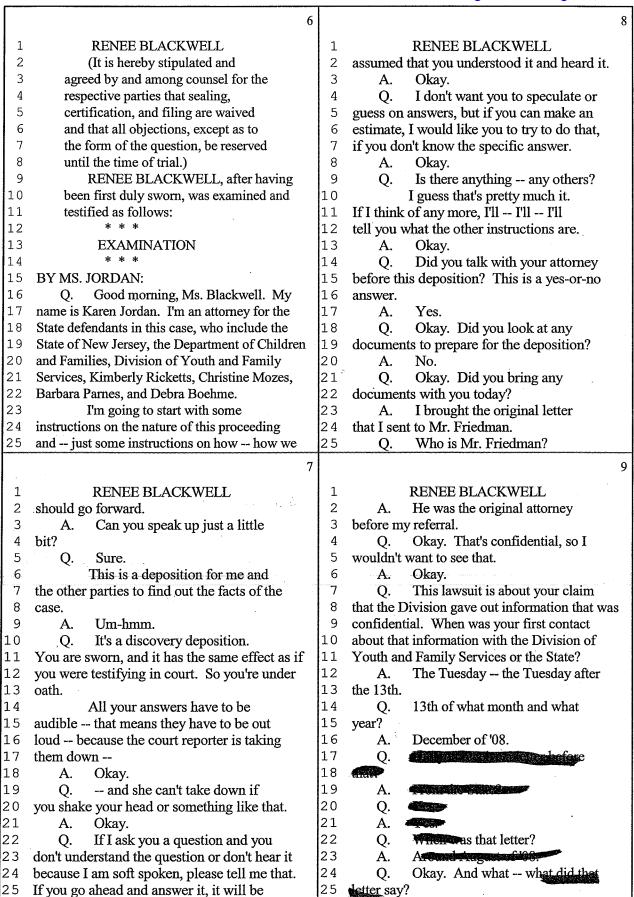
## EXHIBIT A

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1
 1
                     RENEE BLACKWELL
 2
          IN THE UNITED STATES DISTRICT COURT
 3
                 DISTRICT OF NEW JERSEY
                    (Camden Vicinage)
 4
 5
   RENEE BLACKWELL,
                                  CIVIL ACTION
                Plaintiff
 6
   STATE OF NEW JERSEY
 7
         and
   NEW JERSEY DEPARTMENT OF
   CHILDREN AND FAMILIES,
   DIVISION OF YOUTH AND
 9
   FAMILY SERVICES
         and
10
   CHRISTINE MOZES,
   INDIVIDUALLY AND IN HER
11
   OFFICIAL CAPACITY AS
   DIRECTOR OF DIVISION OF
12
                      SERVICES
   YOUTH AND FAMILY
         and
   KIMBERLY RICKETT
13
                      [sic]
   INDIVIDUALLY AND
                      ΙN
14
   OFFICIAL CAPACITY AS
   COMMISSIONER OF NEW JESSEY
15
   DEPARTMENT OF CHILDREN
   FAMILIES
16
         a n d
   DOLORES HELB,
                  INDIVIDUALLY:
   AND IN HER OF LAL
17
   CAPACITY AS AN EMPLOYEE OF:
18
   NEW JERSEY DEPARTMENT OF
   CHILDREN AND FA MILES
19
         and
   DEBRA BOEHME, INDIVIDUALLY:
20
   AND IN HER OFFICIAL
   CAPACITY AS AN EMPLOYEE OF:
21
   NEW JERSEY DEPARTMENT OF
   CHILDREN AND FAMILIES
22
         and
23
24
25
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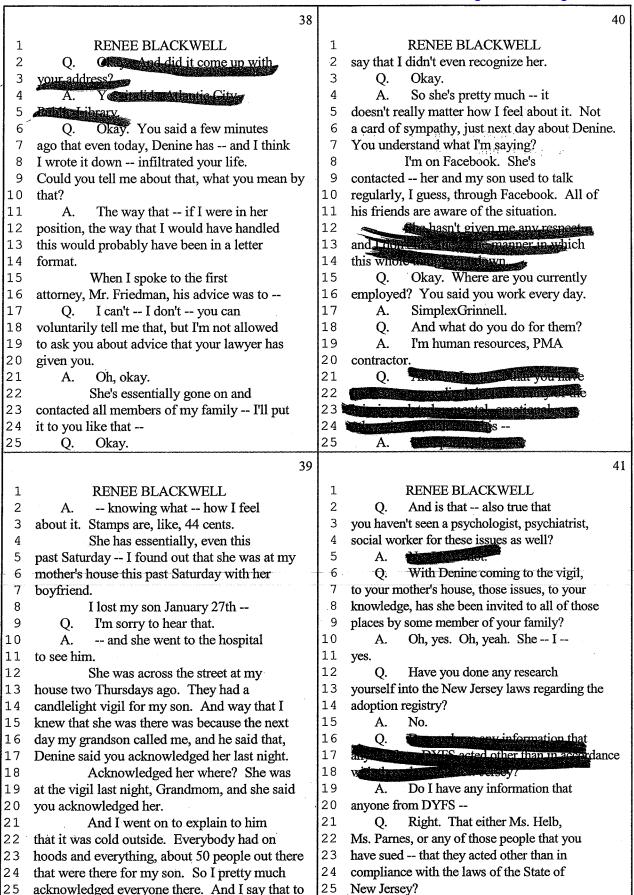


		<u> </u>		
	14			16
1	RENEE BLACKWELL	1		RENEE BLACKWELL
2	Q. Yes.	2	A.	Green the Cogardes Colle
3	A. I would assume they both left	3	whether	nonviole Learning bracksterier prince Station?
4	the porch and got back in the I think it was	4	went on	ing a solose conty and or mention can yhong
5	a black SUV.	5	Q.	Directic say that are your
6	Q. Okay. Did Dennie ever contact	6	A.	News herolie and issue
7	you again?	7	Q.	Had you talked to Jenine about
8	A. I've never-heard from her smeet	8		re before well, let's start
9	there	9	with, bef	ore the day that Denine came to your
10	Q. Okay. When did you next talk to	10	door	
11	anybody about Denine's search for her	11	A.	No.
12	biological mother?	12	Q.	had you talked to Jenine?
13	A. The following Tuesday. Okay?	13	A.	No.
14	Monday, Friedall day to get in touch with	14	Q.	How about before you spoke to
15	Ms. Heb. I was unable to get in touch with	15	Ms. Parn	es?
16	Ms. Helb. I did not leave a message. I wanted	16	A.	Did I speak to
17	to speak to someone.	17	Ms. Parn	es about
18	On Thesing I offermessage and	18	Q.	Didyonsperkandening 10 5 6
19	get a return phone call from Parbara Paraeson	19	youspok	cated subtants.
20	my cell phone.	20	A.	No
21	Q. And what was that conversation?	21	Q.	hefore this conversation was
22	A. I explained what happened on	22	just discr	SSE 18-4
23	Saturday, and Management and American Saturday, and Management and American Saturday, and Management Saturday, and Manage	23	A.	
24	because we did not hear from you we	24	Q.	Did you speak to Jenine after
25	essemally want arounded what we had to do	25	that?	
	15			17
1				
1	DENIEE BLACKWELL	1		RENEE BLACKWELL
1 2	RENEE BLACKWELL	1 2	Α	RENEE BLACKWELL
2	At that same conversation, I	2	A. O	No.
2	At that same conversation, I I said, you didn't have any type	2 3	Q.	No. Bidayou speak a alminoan any
2 3 4	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission	2 3 4	Q. times ha	No.  Did you speak a din in an my  dayou bid no in a baging you gar oup
2 3 4 5	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and	2 3 4 5	Q. time don for along	No.  Did you speak to be in a many  day and biological danglets you gave up  ion?
2 3 4 5 6	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.	2 3 4	Q. time dent for a dent A.	No.  Bidayou speak redemine any  dayou biological danglet youngaroup  iou?  Jates and Wards and Jakes youngaroup
2 3 4 5 6 7	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.	2 3 4 5 6 7	Q. time de for adept A. I was not	No.  Bid you speak and in its analy in the plant of the p
2 3 4 5 6 7 8	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She finder in the large of the property of the p	2 3 4 5 6 7 8	Q. time has for cleant A. I was not She never	No.  Did you speak and the glate you gate up in 19.  Leter Watcher she had spoken to Denine. or disclosed it to me.
2 3 4 5 6 7 8 9	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She further than, as a matter of fact, your biological daughter, Jening is specking with Denine right now.	2 3 4 5 6 7 8 9	Q. time do A. I was not She neve Q.	No.  District speak  Later was Which, molelates aware that she had spoken to Denine.  r disclosed it to me.  When you say, "later on," when
2 3 4 5 6 7 8 9	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She further matterials, as a matter of fact, your hielegical daughter, Jening, is peaking with Denine right now. That was a Tuesday.	2 3 4 5 6 7 8 9	Q. time do for a dept A. I was not She neve Q. did you f	No.  District speak  Leter Walls and broken to Denine.  aware that she had spoken to Denine.  r disclosed it to me.  When you say, "later on," when  irst discuss this issue with your
2 3 4 5 6 7 8 9 10	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She further same below as a matter of fact, your hielegical daughter, Jening as peaking with Denine right now. That was a Tuesday. I asked, what number what	2 3 4 5 6 7 8 9 10	Q. time about A. I was not She neve Q. did you f daughter	No.  Lete Walk and spoken to Denine.  aware that she had spoken to Denine.  r disclosed it to me.  When you say, "later on," when irst discuss this issue with your  Jenine?
2 3 4 5 6 7 8 9 10 11	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She in the said that, as a matter of fact, your hielegical daughter, Jening is publing with Denine right now. That was a Tuesday.  I asked, what number what number did you give my daughter; what number	2 3 4 5 6 7 8 9 10 11	Q. time don't A. I was not She neve Q. did you f daughter A.	No.  Did you speak the plant you gain up it is a speak to Denine.  The water that she had spoken to Denine.  It disclosed it to me.  When you say, "later on," when itst discuss this issue with your Jenine?
2 3 4 5 6 7 8 9 10 11 12 13	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She further than, as a matter of fact, your hielegical daughter, Jennet's perking with Denine right now. That was a Tuesday.  I asked, what number what number did you give my daughter; what number are you using? She gave me a number. I	2 3 4 5 6 7 8 9 10 11 12 13	Q. time day for days A. I was not She neve Q. did you f daughter A. Q.	No.  July of speak  Late Wash and Inglate you gate up  aware that she had spoken to Denine.  r disclosed it to me.  When you say, "later on," when first discuss this issue with your  Jenine?  Okay. And when was that, if you
2 3 4 5 6 7 8 9 10 11 12 13 14	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She trained and the said and the sai	2 3 4 5 6 7 8 9 10 11 12 13 14	Q. time do A. I was not She neve Q. did you f daughter A. Q. can give	No.  Later was biological dragate year aup in the plant of the plant year are that she had spoken to Denine. It disclosed it to me.  When you say, "later on," when it discuss this issue with your Jenine?  Okay. And when was that, if you me a month?
2 3 4 5 6 7 8 9 10 11 12 13 14 15	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She further same below, as a matter of fact, your hielegical daughter, Jening to publicate the perime right now. That was a Tuesday.  I asked, what number what number did you give my daughter; what number are you using? She gave me a number. I believe it began with a nine. It was not a familiar number. And I became very upset.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. time days for ideas for	No.  Leter Well- aware that she had spoken to Denine.  r disclosed it to me.  When you say, "later on," when irst discuss this issue with your Jenine?  Okay. And when was that, if you me a month?  It's going to be very difficult.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She further than, as a matter of fact, your hielegical daughter, Jenine's pething with Denine right now. That was a Tuesday.  I asked, what number what number did you give my daughter; what number are you using? She gave me a number. I believe it began with a nine. It was not a familiar number. And I became very upset.  Q. This was Jenine's number	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. time day for days A. I was not She neve Q. did you f daughter A. Q. can give A. It's going	No.  Lete We had spoken to Denine.  aware that she had spoken to Denine.  r disclosed it to me.  When you say, "later on," when irst discuss this issue with your Jenine?  Okay. And when was that, if you me a month?  It's going to be very difficult.  to be very difficult.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She that the latest and the latest are as a matter of fact, your hielegical daughter, Jennet's perhing with Denine right now. That was a Tuesday.  I asked, what number what number did you give my daughter; what number are you using? She gave me a number. I believe it began with a nine. It was not a familiar number. And I became very upset.  Q. This was Jenine's number starting with a nine?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. time day for days A. I was not She never Q. did you for daughter A. Q. can give A. It's going Q.	No.  Jate Washed Late aware that she had spoken to Denine. or disclosed it to me.  When you say, "later on," when first discuss this issue with your Jenine?  Okay. And when was that, if you me a month?  It's going to be very difficult. or to be very difficult.  And what was that conversation
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She further than, as a matter of fact, your hielegical daughter, Jening to perhing with Denine right now. That was a Tuesday.  I asked, what number what number did you give my daughter; what number are you using? She gave me a number. I believe it began with a nine. It was not a familiar number. And I became very upset.  Q. This was Jenine's number starting with a nine?  A. She said that it was Jenine's	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. time day for dept A. I was not She neve Q. did you f daughter A. Q. can give A. It's going Q. when you	No.  Lete We had spoken to Denine.  aware that she had spoken to Denine.  r disclosed it to me.  When you say, "later on," when irst discuss this issue with your Jenine?  Okay. And when was that, if you me a month?  It's going to be very difficult.  to be very difficult.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She think the said into as a matter of fact, your biological daughter, Jening to perhing with Denine right now. That was a Tuesday.  I asked, what number what number did you give my daughter; what number are you using? She gave me a number. I believe it began with a nine. It was not a familiar number. And I became very upset.  Q. This was Jenine's number starting with a nine?  A. She said that it was Jenine's number. Ms. Parnes said it was Jenine's	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. time day for ale of A. I was not She neve Q. did you f daughter A. Q. can give A. It's going Q. when you Jenine?	No.  Let aware that she had spoken to Denine.  r disclosed it to me.  When you say, "later on," when irst discuss this issue with your Jenine?  Okay. And when was that, if you me a month?  It's going to be very difficult.  to be very difficult.  And what was that conversation is had that first conversation with
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She trained author, as a matter of fact, your biological daughter, Jening is speaking with Denine rightney. That was a Tuesday.  I asked, what number what number did you give my daughter; what number are you using? She gave me a number. I believe it began with a nine. It was not a familiar number. And I became very upset.  Q. This was Jenine's number starting with a nine?  A. She said that it was Jenine's number. Ms. Parnes said it was Jenine's number. Jenine is my daughter biological.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. time day for ale of A.  I was not She neve Q. did you f daughter A. Q. can give A. It's going Q. when you Jenine? A.	No.  In the specific of the plant of the pla
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She that the said has as a matter of fact, your hielegical daughter, Jennet's perhing with Denine right now.  That was a Tuesday.  I asked, what number what number did you give my daughter; what number are you using? She gave me a number. I believe it began with a nine. It was not a familiar number. And I became very upset.  Q. This was Jenine's number starting with a nine?  A. She said that it was Jenine's number. Ms. Parnes said it was Jenine's number. Jenine is my daughter biological. It's J-e-n-i-n-e. And, ironically, the adopted	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. time day for ale of A.  I was not She neve Q. did you f daughter A. Q. can give A. It's going Q. when you Jenine? A. daughter	No.  Leter Well and spoken to Denine.  aware that she had spoken to Denine.  r disclosed it to me.  When you say, "later on," when irst discuss this issue with your Jenine?  Okay. And when was that, if you me a month?  It's going to be very difficult.  to be very difficult.  And what was that conversation a had that first conversation with  It was through an email that my sent to me, that she had spoken with
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She further than, as a matter of fact, your biological daughter, Jenine, is perhing with Denine right now. That was a Tuesday.  I asked, what number what number did you give my daughter; what number are you using? She gave me a number. I believe it began with a nine. It was not a familiar number. And I became very upset.  Q. This was Jenine's number starting with a nine?  A. She said that it was Jenine's number. Ms. Parnes said it was Jenine's number. Jenine is my daughter biological. It's J-e-n-i-n-e. And, ironically, the adopted daughter is Denine.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. time the for elever A. I was not She never Q. did you f daughter A. Q. can give A. It's going Q. when you Jenine? A. daughter Denine a	No.  In the speak of the plate yet gains up in 2  Late Wash, and has poken to Denine.  It disclosed it to me.  When you say, "later on," when irst discuss this issue with your Jenine?  Okay. And when was that, if you me a month?  It's going to be very difficult.  It be very difficult.  And what was that conversation at had that first conversation with  It was through an email that my sent to me, that she had spoken with and she felt that — I printed the email
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She further and blank, as a matter of fact, your biological daughter, Jenine, is pething with Denine right now. That was a Tuesday.  I asked, what number what number did you give my daughter; what number are you using? She gave me a number. I believe it began with a nine. It was not a familiar number. And I became very upset.  Q. This was Jenine's number starting with a nine?  A. She said that it was Jenine's number. Ms. Parnes said it was Jenine's number. Jenine is my daughter biological. It's J-e-n-i-n-e. And, ironically, the adopted daughter is Denine.  Q. She has Ms. Parnes or Parnes	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. time day for dept A. I was not She never Q. did you for daughter A. Q. can give A. It's going Q. when you Jenine? A. daughter Denine a out; I don	No.  Later which give below to Denine.  aware that she had spoken to Denine.  r disclosed it to me.  When you say, "later on," when irst discuss this issue with your Jenine?  Okay. And when was that, if you me a month?  It's going to be very difficult.  and what was that conversation with  It was through an email that my sent to me, that she had spoken with and she felt that — I printed the email in't know what it was — she felt
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	At that same conversation, I I asked her I said, you didn't have any type of authorization from me, no permission whatsoever. She said, no, we just went on and did what we had to do.  She further than, as a matter of fact, your biological daughter, Jenine, is perhing with Denine right now. That was a Tuesday.  I asked, what number what number did you give my daughter; what number are you using? She gave me a number. I believe it began with a nine. It was not a familiar number. And I became very upset.  Q. This was Jenine's number starting with a nine?  A. She said that it was Jenine's number. Ms. Parnes said it was Jenine's number. Jenine is my daughter biological. It's J-e-n-i-n-e. And, ironically, the adopted daughter is Denine.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. time day for elever A. I was not She never Q. did you for daughter A. Q. can give A. It's going Q. when you Jenine? A. daughter Denine a out; I don'that she	No.  In the speak of the plate yet gains up in 2  Late Wash, and has poken to Denine.  It disclosed it to me.  When you say, "later on," when irst discuss this issue with your Jenine?  Okay. And when was that, if you me a month?  It's going to be very difficult.  It be very difficult.  And what was that conversation at had that first conversation with  It was through an email that my sent to me, that she had spoken with and she felt that — I printed the email

5 (Pages 14 to 17)

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	22		24
1	RENEE BLACKWELL	1	RENEE BLACKWELL
2	old were you?	2	Did you report the rape to
3	A. You would have to subtract her	3	anybody?
4	present age from 64, and that's the way you'd	4	A. No.
5	have to come up with it.	5	Q. Did you talk to anyone in your
6	Q. Okay. Didyen have any and the	6	family about it?
7	children and the finite?	7	A. When I became pregnant, yes.
8	A. Hadawa	8	Q. Who did you talk to about it?
9	Q. And what were their ages?	9	A. Josie and my mother.
10	A. They were toddlers, maybe 4 or 5	10	Q. Who is Josie?
11	years old. They were toddlers.	11	A. Josie Hollingsworth is my aunt
12	Q. Was one of those children	12	by marriage, and she works for the
13	Jenine?	13	children of at that time, she worked for the
14	A. Januswassens.	14	State. She worked DYFS.
15	Q. And what was the name of the	15	Q. Where does she live right now?
16	other children?	16	A. Mays Landing.
17	A. Samstern.	17	Q. Do you have her address?
18	Q. Were you married at the time?	18	A. At home.
19	A. No, I've never been married.	19	Q. Could you provide it to your
20	Q. Were you working at the time?	20	attorney?
21	A. No, I don't think so.	21	MS. JORDAN: And I'll ask that
22	Q. Did you have any kind of income	22	you provide that address.
23	at that time?	23	MR. BAIRD: We will do that. BY MS. JORDAN:
24 25	A. Medicaid, probably, for a year.	25	
23	Q. Were you on welfare at that	123	Q. And did you say your mother
	23		25
1	RENEE BLACKWELL	1	RENEE BLACKWELL
2	time?	2	also?
3	A. Yes.	3	A. Yes.
4	Q. Were you living with your aunt	4	Q. Where is she living now?
5	at that time, when Denine was born?	5	A. Jeffries Towers in Atlantic
6	A. No. I had moved out and gotten	6	City.
7	my own place.	7	Q. Okay. I'm also going to make
- 8	Q. Who lived in that home?	8	the same request for her address, unless you
9	A. Who lived in that home?	9	know it.
10	Q. Who lived there, yes.	10	A. 227 Vermont Avenue, Apartment
11	A. My two children and myself, the	11	907, Atlantic City, New Jersey.
12	apartment.	12	Q. Okay. How did
13	Q. Did you know Denine's father	13	a more about that you cave un Denine for
14	before you allege that he raped you. Did	14	adeption de Howelt Control
15	you know him before that?	15	A. It came about because I could
16	A. Yes.	16	not afford to care for her. With two toddlers,
17	Q. How did you know him?	17	a single parent by choice, nine months to think
18	A. I met him in the street, at a	18	about it I could not affect to care for
19	bar, probably. Yes.	19	O Olyan
20	Q. How long did you know him?	20	Q. Okay.
21	A. Off and on, for maybe a year.	21	A
22	Q. And did you continue to have a	22	O And what stong did you take go
23	relationship with him after	23	Q. And what steps did you take so
24	A. No.	24	that she would be adopted?
25	Q the rape?	25	A. Spoke to my Aunt Josie.

1 RENEE BLACKWELL 2 Q. Have you had any treatment for 3 those injuries? 4 A. No. 5 Q. Are you claiming — 6 A. I have congestive heart failure. 7 I have medication. I've been advised to have a 8 pacemaker, which I refuse to have. But beat 9 up, that type of thing, no, but she has, even 10 now, completely infiltrated my life, even now, 11 and I really do resent that. 12 Q. Do you claim any physical injury 13 as a result of this incident? 14 A. Of this incident? 15 Q. Um-hmm. 16 A. No, I can't say that, not in 17 truthful – no. 18 Q. Are you working now? 19 A. Working? 20 Q. Are you working? 21 A. Every day. 22 Q. Have you lost any work because 23 of this incident? 24 A. No, just times coming for 25 attorney – no.  18 RENEE BLACKWELL 2 Q. Okay. I'm just going to take a 3 minute. I actually might be finished. 4 A. Okay. 5 Q. And then Mr. Mikulski will have 6 the opportunity to question you. 7 A. Okay. 8 * * * 9 (Pause) 10 A. No. 11 BY MS. JORDAN: 12 Q. Ms. Blackwell, in discovery, we 13 provided a statement by Denine Harvey [sic] to 14 your attorney. Have you seen that statement? 15 A. No. 16 MS. JORDAN: Okay. I think I'm 17 finished. 18 * * * 19 EXAMINATION 19 A. No, not from attorneys have told you. 18 here. 19 G. Way. I don't want you know, 19 Ms. Blackwell, good morning. 20 Q. Ms. Blackwell, good morning. 21 BY MR. MIKULSKI: 22 Q. Ms. Blackwell, good morning. 22 Q. Ms. Blackwell, good morning.	<u> </u>	U9-CV-U3004-GEB -DEA DOCUMENT 35-2		ned erroer to it ago o of oil agold. 200
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16 A. No, I can't say that, not in truthful – no.  18 Q. Are you working now?  19 A. Working?  20 Q. Are you working?  21 A. Every day.  22 Q. Have you lost any work because of this incident?  23 of this incident?  24 A. No, just times coming for 25 attorney – no.  25 attorney – no.  26 And then Mr. Mikulski will have the opportunity to question you.  27 A. Okay.  28 **  9 (Pause)  10 **  10 Park Ms. JORDAN:  11 Okay.  12 Q. Ms. Blackwell, in discovery, we provided a statement by Denine Harvey [sic] to your attorney. Have you seen that statement?  18 Q. Not just that Monday, but any time?  20 A. Never.  21 Q. Did you receive any other letters from her other than that one letter?  22 A. No.  24 Q. And was that letter on State of New Jersey letterhead?  31 RENEE BLACKWELL  2 Q. Okay. I'm just going to take a 3 minute. I actually might be finished.  4 A. Okay.  5 Q. And then Mr. Mikulski will have the opportunity to question you.  7 A. Okay.  8 ***  9 (Pause)  10 ***  10 Q. Ms. Blackwell, in discovery, we provided a statement by Denine Harvey [sic] to your attorney. Have you seen that statement?  15 A. No.  16 Ms. JORDAN: Okay. I think I'm finished.  17 Q. Okay. I don't want you to tell me what your attorneys have told you.  18 Q. Okay. Tell me what you know, then.  19 EXAMINATION  19 A. No, not from attorneys.  20 Q. Okay.  21 BY MR. MIKULSKI:  22 Q. Ms. Blackwell, good morning.		and the state of the	15	
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25 represent Dolores Helb. 25 and a piece of paper of the State of				



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1	RENEE BLACKWELL	1	RENEE BLACKWELL
2	INSTRUCTIONS TO WITNESS	2	ACKNOWLEDGMENT OF DEPONENT
3	Please read your deposition over	3	I,, do hereby
4	carefully and make any necessary corrections.	4	certify that I have read the foregoing pages
5	You should state the reason in the appropriate	5	to and that the same is a correct
6	space on the errata sheet for any corrections	6	transcription of the answers given by me to the
7	that are made.	7	questions therein propounded, except for the
8	After doing so, please sign the	8	corrections or changes in form or substance, if
9	errata sheet and date it.	9	any, noted in the attached Errata Sheet.
10	You are signing same subject to	10	
11	the changes you have noted on the errata sheet,	11	DATE SIGNATURE
12	which will be attached to your deposition.	12	
13	It is imperative that you return	13	Subscribed and sworn to before me this
14	the original errata sheet to the deposing	14	day of,
15	attorney within thirty (30) days of receipt of	15	2010.
16	the deposition transcript by you. If you fail	16	My commission expires:
17	to do so, the deposition transcript may be	17	
18	deemed to be accurate and may be used in court.	18	
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